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March 21, 2019

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Upon Jochola, et al v. Green Summit Group LLC, et al.
18-cv-1360

Cruz Sanchez, et al v. Rainbow Umbrella, LLC, et al.
17-cv-9065

Your Honor:

This office represents Plaintiffs in the above- referenced matters. We write jointly with counsel for Defendants to request a 30 day extension to file Plaintiffs' motion for settlement to April 22, 2019. The reason for the request is because the parties will shortly circulate a draft agreement and will review and send it to the respective clients after review. Thus, we respectfully request a deadline of April 22, 2019 to submit Plaintiffs' motion for settlement. We thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/ Michael Faillace
Michael Faillace

cc: Jason Klimpl, Esq. (via ECF)
Vincent Miranda, Esq. (via ECF)